



October 18, 2023

The Honorable Sarah Netburn
United States Magistrate Judge
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square Room 430
New York, NY 1000

Re: *Lynne Freeman v. Tracy Deebs-Elkenaney et. al.*, Case No. 22 Civ 2435 (LLS) (SN)

Dear Judge Netburn:

We represent the Plaintiff, Lynne Freeman, in the above captioned matter. We write to thank the Court for issuing its recent Second Amended Scheduling Order (ECF No. 269) and request a modification on one issue.

Pursuant to an August 16, 2023, joint letter filed by the parties, the previous Amended Scheduling Order provided that “Plaintiff shall file one motion for summary judgment against all Defendants. The brief in support of the motion shall not exceed 30 pages.” The Second Amended Scheduling Order provides that “Plaintiff shall file two motions for summary judgment against the Publishing Defendants and the Prospect Defendants. Each brief in support of the motion shall not exceed 25 pages.”

We respectfully request that Your Honor modify the language in the Second Amended Scheduling Order to conform to the language in the Amended Scheduling Order, subject to leaving the due date Monday, November 20, 2023.

We discussed the issue with Defendants counsel, and they have no objection to the change.

We thank the Court for its time and attention to this matter.

11766 Wilshire Boulevard, Suite 1470, Los Angeles, CA 90025

Phone: (310) 861-2470 • Fax: (310) 861-2476

mark@reeder-mccreary.com • www.markpassin.com

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Respectfully submitted,

Reeder McCreary, LLP

A handwritten signature in dark ink, appearing to read 'Mark D. Passin', is written over a horizontal line.

Mark D. Passin
11766 Wilshire Boulevard,
Suite 1470
Los Angeles, CA 90025
310-861-2475

DONIGER/BURROUGHS

Stephen Doniger, Esq.
603 Rose Avenue
Venice, California 90291
(31) 590-1820
stephen@donigerlawfirm.com
Attorneys for Plaintiff Freeman

cc: All counsel of record (via ECF)